



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMK/WMP/MTK
F. #2013R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 3, 2016

BY FEDEX

James Kousouros, Esq.
The Law Offices of James Kousouros
260 Madison Ave, 22nd Floor
New York, New York 10016-2404

Re: United States v. Gregg Mulholland
Criminal Docket No. 14-476 (S-1) (ILG)

Dear Mr. Kousouros:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. The materials in this production are produced on two discs and consist of documents recently provided to the government by the U.S. Securities and Exchange Commission relating to IPC (Bates stamped SEC-NY-8929-000000001 – SEC-NY-8929-000001800) and transcripts of Skype conversations between the defendants Brian De Wit and Philip Kueber (Bates stamped EDNY-IPC-000026490 – EDNY-IPC-000030113). This disclosure supplements the government's earlier productions. The government again requests reciprocal discovery.

Additionally, it has come to the government's attention that a spreadsheet produced to the defendant on August 7, 2015 and Bates stamped EDNY-IPC-000017992 was mistakenly identified as a BNY Mellon record. The source of this record is actually Northern Trust International. The government intends to rely on this spreadsheet in support of the charges in the superseding indictment, in addition to the bank records previously identified in the government's January 31, 2016 letter.

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If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

ROBERT L. CAPERS
United States Attorney
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Enclosure

Cc: Clerk of Court (ILG) (by ECF) (w/o enclosures)